

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

v.

**CANON INC. AND CANON U.S.A.,
INC.,**

Defendants.

CIVIL ACTION 6:20-cv-00980-ADA-DTG

CANON INC.,

Third-Party Plaintiff,

v.

NXP USA, INC.,

Third-Party Defendant.

CIVIL ACTION 6:20-cv-00980-ADA-DTG

JOINT MOTION TO STAY ALL DEADLINES

On August 19, 2022, Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendants Canon Inc. and Canon U.S.A., Inc.’s (“Canon”) (collectively, “Parties”) filed a Joint Notice of Settlement and Motion to Stay All Deadlines. ECF No. 187. And on August 22, 2022, the Court granted the Parties’ motion and stayed all deadlines until September 19, 2022. ECF No. 188. On September 19, 2022, and October 19, 2022, the Parties filed further Joint Motions to Stay All Deadlines, which were granted by the Court.

ECF No. 191, September 27, 2022, Text Order (“Granting [191] Motion to Stay”); ECF No. 194, October 20, 2022, Text Order (“Granting [194] Motion to Stay”).

A settlement in principle has been reached to resolve all matters in controversy asserted by Brazos’s Complaint (ECF No. 70).¹ Accordingly, the Parties request a further stay of all deadlines by two (2) business days to allow for negotiations to be finalized and the Parties to submit a motion to dismiss all claims at issue.

The Parties expect to file dismissal papers within two (2) business days.

In light of this settlement and impending dismissal, the Parties respectfully request the Court stay all impending deadlines until November 22, 2022.

¹ The settlement in principle also resolves the additional proposed claims that were the subject of Brazos’s pending motion to amend seeking, *inter alia*, leave to file a third amended complaint. ECF No. 176.

Dated: November 18, 2022

Respectfully Submitted

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 18th day of November, 2022, via the Court's CM/ECF system.

/s/ Jonathan K. Waldrop
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